

28 January 2020

Mr Gavin Jones
Director, Adjudication
Australian Competition and Consumer Commission
23 Marcus Clarke Street
CANBERRA ACT 2601

By email only: adjudication@accc.gov.au

Dear Mr Jones

Submission by CuString Pty Ltd (CopperString 2.0) in relation to Draft Determination and interim authorisation – AA1000454 – Stanwell Corporation Limited and Diamantina Power Station Pty Ltd

We refer to the Draft Determination and interim authorisation dated 19 December 2019. Thank you for the opportunity to provide a submission in relation to the draft authorisation sought by Stanwell Corporation Limited (Stanwell) and Diamantina Power Station Pty Ltd (DPS) (the Applicants).

CuString Pty Ltd would like to make the following points as its submission to the draft determination.

- 1.0 CuString acknowledges the importance of the Dispatch Protocol in enabling the NWPS Participants to operate the isolated grid in a safe, secure and reliable manner for the benefit of all Participants.
- 2.0 CuString continues to develop the CopperString 2.0 project to connect the NWPS to the NEM with positive engagement and support from the significant stakeholders in the NWPS – particularly the energy users and the community. The project timeline remains as per our 13 November 2019 submission with target connection date of mid 2024.
- 3.0 CuString has been accepted as an Intending Participant under the Dispatch Protocol and is progressing the technical studies required to fully understand the technical issues involved in connecting the NWPS to the NEM. CuString also acknowledges DPS Co statement that it is willing to progress CuString's entry into the NWPS, and negotiate with CuString in good faith to facilitate connection to the NEM and enable it to contract with Participants; and, subject to reaching an appropriate cost and resource-sharing arrangement between the NWPS participants, review the technical standards and other aspects of the NWPS.
- 4.0 As noted by Diamantina Power Station Pty Ltd in its submission dated 29 November 2019 the connection of an isolated grid to the NEM has occurred previously and the differences in technical and operational protocols can be overcome by derogations in regulations and investment in physical changes.
- 5.0 CuString understands the ACCC's reasoning to propose to re-authorisation for a period of 5 years rather than the 3 years proposed by CuString. CuString takes comfort in the role of the ACCC to initiate a review of any authorisation as noted at clause 4.34 of the Draft Determination and interim authorisation which states "the ACCC may also initiate a review of any authorisation if it considers there has been a material change of circumstances since the authorisation was

granted. For instance, should more information about CopperString 2.0 (including more certainty around its timing, progress and negotiations with NWPS participants) become available, the ACCC may be able to review the authorisation and seek submissions from the interested parties. If a review is initiated, and following such a review the ACCC is satisfied that the likely public benefits from the Conduct no longer outweighs the likely detriments to the public, the ACCC may revoke the authorisation”.

6.0 CuString will ensure that all Participants of the NWPS and the ACCC are kept informed on the progress of the CopperString 2.0 project as it advances to investment decision anticipated in early 2021.

Thank you for the opportunity to provide this submission on the Draft Determination and interim authorisation. Please do not hesitate to contact me if you have any questions or would like me to provide further information.

Yours sincerely,



John G O'Brien
Executive Chairman
CuString Pty Ltd